

# EXHIBIT A

*Intellectual Ventures I LLC and Intellectual Ventures II LLC v. American Airlines, Inc.*, C.A. No. 4:24-cv-00980-ALM  
Joint Claim Construction Statement: Disputed Terms – Exhibit A

This exhibit includes IV's proposed constructions for disputed terms identified in the parties' P.L.R. 4-3 disclosures, including identification of intrinsic and/or extrinsic evidence for each disputed term. Claim construction briefing has not commenced and discovery is on-going. IV reserves all rights to amend its disclosures, including its constructions and identification of intrinsic and/or extrinsic evidence, for example in response to American's disclosures.

**U.S. Patent No. 8,027,326**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 7,712,080**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 7,721,282**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 7,822,841**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 8,352,584**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 10,103,845**

IV's position is that no claim construction is required for this asserted patent.

**U.S. Patent No. 11,032,000**

IV's position is that no claim construction is required for this asserted patent.

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**U.S. Patent No. 8,332,844**

Claims	Terms/Phrases	IV's Proposed Construction	IV's Intrinsic Evidence	IV's Extrinsic Evidence
7, 11	"root image"	Plain and ordinary meaning, no construction necessary	Abstract; 2:14-31; 2:36-3:2; 4:13-25; 5:12-5:58; 6:4-30; 6:38-8:4; 8:13-25; 8:32-38; 8:64-10:43; 10:56-11:6; 11:10-19; 11:27-40; 11:56-59; 11:66-22; 12:26-34; 12:42-61; 13:31-14:2; 14:10-17.	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV's position regarding proper construction, including how the intrinsic evidence for this patent supports IV's proposed construction and how American's proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.  Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.

**U.S. Patent No. 8,407,722**

Claims	Terms/Phrases	IV's Proposed Construction	IV's Intrinsic Evidence	IV's Extrinsic Evidence
14	"input source"	Plain and ordinary meaning, no construction necessary	Abstract; 3:9-4:2; 11:21-12:36; 13:17-14:13; 15:42-67; 16:47-65; 17:45-55;	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV's

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			17:66-18:11; 18:52-19:23; 21:53-22:16; 22:27-47; 23:8-29; 23:54-24:14; 24:38-64; 25:15-45; 32:6-35; Figs. 5, 8, 10, and corresponding descriptions.	position regarding proper construction, including how the intrinsic evidence for this patent supports IV's proposed construction and how American's proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.  Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.
14	"identify a category of the update message based on the input source"	Plain and ordinary meaning, no construction necessary	Abstract; 3:9-38; 5:26-48; 7:56-8:24; 9:21-9:63; 11:11-20; 11:38-57; 12:5-36; 13:17-32; 13:63-14:13; 16:28-46; 18:40-19:39; 19:40-20:24; 21:6-17; 21:62-22:16; 22:27-58; 23:8-37; 23:44-53; 23:54-24:14; 24:32-64; 25:11-45; 26:1-35; 26:52-56; Figs. 5, 10, and corresponding descriptions.	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV's position regarding proper construction, including how the intrinsic evidence for this patent supports IV's proposed construction and how American's proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of

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			See also the evidence and information cited for “input source.”	ordinary skill in the art would construe this term.  Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.
14	“node type”	Plain and ordinary meaning, no construction necessary Not indefinite	3:39-59; 18:30-20:8; 21:17-21:42; 21:53-22:16; 22:27-47; 23:18-29; 23:51-24:14; 24:27-64; 25:8-45; 25:56-59; 26:1-35; 26:48-56; Figs. 9-12 and corresponding descriptions.	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction and that this term is not indefinite because this term, read in view of the intrinsic evidence, informs with reasonable certainty those of ordinary skill in the art regarding the scope of the invention and inconsistent with how a person of ordinary skill in the art would construe this term.  Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.
14	“property of the live object”	Plain and ordinary meaning, no construction necessary Not indefinite	Abstract; 3:9-38; 5:26-6:2; 6:61-9:2; 9:21-40; 9:50-10:13; 10:58-12:22; 12:23-36; 12:47-13:25; 13:63-14:43; 15:15-41; 22:27-52;	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction and that this

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			22:66-23:29; 23:54-24:26; 24:38-25:7; 25:14-55; 26:6-47; Fig. 2 and corresponding description.	term is not indefinite because this term, read in view of the intrinsic evidence, informs with reasonable certainty those of ordinary skill in the art regarding the scope of the invention and inconsistent with how a person of ordinary skill in the art would construe this term. Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.
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**U.S. Patent No. 7,949,785**

Claims	Terms/Phrases	IV's Proposed Construction	IV's Intrinsic Evidence	IV's Extrinsic Evidence
30, 37	"network address"	Plain and ordinary meaning, no construction necessary	Abstract; 1:38-2:25; 5:48-7:42; 8:66-9:8; 9:9-17; 10:40-59; 12:40-13:5; 13:22-40; 13:60-14:9; 25:31-36; 26:1-5; 34:35-62; 35:19-36:18; 36:37-56; 37:13-38:5; 38:24-48; 38:65-39:37; 39:48-40:7; 40:22-49; 40:61-41:25; 41:20-26; Figs. 7, 12b, 21, 24-26, and corresponding descriptions.	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV's position regarding proper construction, including how the intrinsic evidence for this patent supports IV's proposed construction and how American's proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent

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				<p>with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00786, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p>
30	“network route director”	Plain and ordinary meaning, no construction necessary	<p>6:62-67; 10:24-31; 10:40-59; 11:9-18; 12:18-31; 13:6-65; 14:23-15:49; 17:24-39; 20:6-13; 20:55-21:39; 22:36-52; 24:37-57; 25:17-41; 26:14-34; 27:6-17; 27:65-28:47; 30:1-32; 31:5-32:62; 33:15-63; 34:35-62; 34:66-35:2; 35:22-25; 35:63-36:7; 36:11-18; 36:31-56; 37:20-58; 38:6-8; 38:24-48; 40:61-41:14; 42:10-12; Figs. 6b, 12b, 19, 21, and corresponding descriptions.</p>	<p>Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction, including how the intrinsic evidence for this patent supports IV’s proposed construction and how American’s proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony</p>

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				<p>regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00786, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p>
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**U.S. Patent No. 7,324,469**

Claims	Terms/Phrases	IV’s Proposed Construction	IV’s Intrinsic Evidence	IV’s Extrinsic Evidence
24	“a remote location a experiencing a relatively high volume of transient traffic”	Plain and ordinary meaning, no construction necessary	1:34-2:10; 2:43-3:23; 3:43-67; 6:38-60; 8:20-50.	<p>Expert testimony from Dr. Joseph Camp in direct rebuttal in support of IV’s position regarding proper construction, including how the intrinsic evidence for this patent supports IV’s proposed construction and how American’s proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of</p>



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				ordinary skill in the art for this patent.
24	“a relatively high volume of transient traffic”	Plain and ordinary meaning, no construction necessary Not indefinite	1:34-2:10; 2:43-3:23; 3:43-67; 6:38-60; 8:20-50.	<p>Expert testimony from Dr. Joseph Camp in direct rebuttal in support of IV’s position regarding proper construction and that this term is not indefinite because this term, read in view of the intrinsic evidence, informs with reasonable certainty those of ordinary skill in the art regarding the scope of the invention and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Camp may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>dictionary.com entry for relative (adv., (1) “in a relative manner”; (2) “with reference (usually followed by to)” or “in proportion (usually followed by to).”</p> <p>dictionary.com entry for transient (adj., (1) “not lasting, enduring, or permanent; transitory”).</p>

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**U.S. Patent No. 7,257,582**

Claims	Terms/Phrases	IV's Proposed Construction	IV's Intrinsic Evidence	IV's Extrinsic Evidence
1	"partition"	Plain and ordinary meaning, no construction necessary	<p>Abstract; 1:61-2:20; 3:22-59; 3:64-4:9; 4:52-5; 5:27-6:40; 6:44-7:3; 8:11-19; Figs. 1-4 and corresponding description.</p> <p><i>See also</i> Appl. No. 10/209,673.</p>	<p>Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV's position regarding proper construction, including how the intrinsic evidence for this patent supports IV's proposed construction and how American's proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00785, including Brief in Support of Patent Owner's Request for Discretionary Denial.</p>

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1	“descriptions of all of said partitions”	Plain and ordinary meaning, no construction necessary	<p>Abstract; 1:61-2:20; 6:44-7:4; 8:11-19.</p> <p><i>See also</i> the evidence and information cited for “partition.”</p> <p><i>See also</i> Appl. No. 10/209,673.</p>	<p>Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction, including how the intrinsic evidence for this patent supports IV’s proposed construction and how American’s proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00785, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p>
1	“c) simultaneously executing at least a respective one of the subtasks of the computer-	<p>Plain and ordinary meaning, no construction necessary</p> <p>Not indefinite</p>	<p>Abstract; 1:29-44; 1:48-54; 2:3-27; 3:36-41; 3:64-4:15; 4:56-5:41; 5:54-6:40; 6:44-64; Figs. 2, 3, and corresponding descriptions.</p>	<p>Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction and that this</p>

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	executable process in each of at least some of said processors on a respective one of the partitions with each subtask reading and processing the respective partition so as to process the respective partition and produce respective subtask output”		<p><i>See also</i> the evidence and information cited for “partition.”</p> <p><i>See also</i> Appl. No. 10/209,673.</p>	<p>term is not indefinite because this term, read in view of the intrinsic evidence, informs with reasonable certainty those of ordinary skill in the art regarding the scope of the invention and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00785, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00785, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p>
1	“on a first-come/first-served basis”	Plain and ordinary meaning, no construction necessary	<p>1:61-2:27; 5:27-33; 5:54-6:13; 7:10-12.</p> <p><i>See also</i> Appl. No. 10/209,673.</p>	Expert testimony from Dr. Eyal de Lara in direct rebuttal in support of IV’s position regarding proper construction, including how

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				<p>the intrinsic evidence for this patent supports IV’s proposed construction and how American’s proposed construction is, partly or in its entirety, incorrect and inconsistent with the intrinsic evidence and inconsistent with how a person of ordinary skill in the art would construe this term.</p> <p>Dr. Eyal de Lara may also offer rebuttal testimony regarding the level of ordinary skill in the art for this patent.</p> <p>Papers, exhibits, and declarations submitted in IPR2025-00785, including Brief in Support of Patent Owner’s Request for Discretionary Denial.</p>
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